



COMMONWEALTH OF MASSACHUSETTS
OFFICE OF CONSUMER AFFAIRS AND BUSINESS REGULATION

**DEPARTMENT OF
TELECOMMUNICATIONS & ENERGY**

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21 Custom House
Boston, Massachusetts 02110

BY FAX AND U.S. MAIL

RE: City of Waltham, D.T.E. 02-11

April 3, 2002

Dear Sirs:

Enclosed please find the Department's second set of information requests on the above-captioned matter. Responses should be filed on or before April 9, 2002. If you have any questions, please feel free to contact me at (617) 305-3620.

Sincerely,

William H. Stevens, Jr.
Hearing Officer

Staff as assigned
Service list
Encl.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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CITY OF WALTHAM)	D.T.E. 02-11
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SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
BOSTON EDISON COMPANY

Pursuant to G.L.c.164, ' 34A, the Department of Telecommunications and Energy ("Department") hereby submits to Boston Edison the following information requests with respect to the above captioned matter.

Instructions

The following instructions apply to this set of information requests and all subsequent information requests issued by the Department to Boston Edison Company in this proceeding.

1. "Company" or "BEC" means Boston Edison Company, its officers, directors, employees, consultants, and attorneys.
2. "City" means the city of Waltham.
3. "Waltham Petition" means the Petition of the City of Waltham, and all attachments, filed with the Department, pursuant to G.L. c. 164, § 34A, on January 24, 2002 and docketed as D.T.E. 02-11.
4. "NSTAR Calculation" means the document entitled "NSTAR Purchase Price Calculation" filed as Attachment B to the Waltham Petition.
5. "Robinson Testimony" means the testimony of Bryant K. Robinson filed by the Company with the Department on March 1, 2002.
6. Each request should be answered in writing on a separate page with a recitation of the request, and with a reference to the request number, the docket number of the case, and the name of the person responsible for the answer. Please submit all responses on three-hole punched paper.
7. Please do not wait for all answers to be completed before supplying answers, but instead please provide the answers as they are completed.
8. These requests shall be deemed continuing so as to require further supplemental responses if the Company or its witnesses receives or generates additional information within the

First Set of Department Information Requests

scope of these requests between the time of the original response and the close of the record in this proceeding.

9. The phrase "provide complete and detailed documentation" means provide all data, assumptions, and calculations on which the response relies; provide the source of and basis for all data and assumptions employed; include all studies, reports, and planning documents from which data, estimates, or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates; and provide and explain all supporting workpapers.
10. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources, and other data compilations from which information can be obtained, and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
11. If the Company finds that any of these requests is ambiguous, please notify the hearing officer so that the requests can be clarified prior to the preparation of a written response.
12. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department. Please also submit the responses directly to: (1) William Stevens, Legal Division; (2) James Byrnes, Rates and Revenues Requirements Division; (2) Joseph Passaggio, Rates and Revenues Requirements Division; (5) Sean Hanley, Rates and Revenues Requirements Division.

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

CITY OF WALTHAM

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D.T.E. 02-11

SECOND SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
BOSTON EDISON COMPANY

- IR-DTE-2-1 Refer to the Company's response to IR-DTE-1-9. Please explain how the apportionment of the gross plant in accounts 632, 633, 634 and 637, based upon the gross plant in accounts 635 and 636, "accounts for the vintages of equipment installed for municipal versus commercial street lighting." Provide complete and detailed documentation to support your response.
- IR-DTE-2-2 Refer to the Company's response to IR-DTE-1-5. Is depreciation expense for financial accounting and rate making purposes calculated separately for each of the street light accounts? If the response is negative, do the accumulated depreciation figures shown on the NSTAR Calculation at 1 (Waltham Petition, Att. B at 1) represent approximations of what accumulated depreciation would be for each of the street lighting accounts if depreciation were computed on an account by account basis?
- IR-DTE-2-3 Refer to the NSTAR Calculation at 1 (Waltham Petition, Att. B at 1). Please list the rates used to calculate depreciation expense for the Waltham street lights included in accounts 632 through 637 since the time that equipment was placed in service.
- IR-DTE-2-4 Refer to the Company's response to IR-DTE-1-6. Please respond yes or no to the following question: the Company's method allocates more gross plant to Account 635 and more accumulated depreciation to Account 636.
- IR-DTE-2-5 Refer to the NSTAR Calculation at 1 (Waltham Petition. Att. B at 1). Please explain why the commercial posts, fixtures and luminaries account has a positive net value while the ancillary equipment supporting those facilities has a net negative value.
- IR-DTE-2-6 Refer to the Robinson Testimony at pages 7-9. Did the Company allocate a greater amount of the net negative value of the ancillary street lighting equipment to commercial, rather than to municipal, because the City's commercial street lighting is older than its municipal street lighting ?